UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: March 23, 1995

SUBJECT: Refined Metals Corporation (IND 000 718 130)
Revised Part A permit application

FROM: Rob Hoelscher, RPB

TO: Jonathon Adenuga, REB

Following our conversation today, I contacted Paula Bansch of IDEM to discuss the revised Part A application transmitted in a letter dated March 5, 1995, to the U.S. DOJ from Robert Steinwurtzel on behalf of Refined Metals Corporation. Apparently, the Consent Decree/Order will reference a Part A application to address the interim or final changes to the Refined Metals facility. In his letter, Mr. Steinwurtzel expresses the necessity of written approval from the regulatory agencies "before the Company undertakes the necessary modifications".

As you know, I am not familiar with the details of the tentative agreements between the U.S. EPA and Refined Metals or those between the State of Indiana and Refined Metals. Considering the eventual role played by RPB when Refined Metals seeks a RCRA permit, I would like to raise the following issues regarding the revised Part A application:

- Does this application represent the "final" or "interim" RCRA unit listing? In other words, do the units, capacities, and waste types reflect what was present in the past, what will be present until Refined secures a permit (interim), or what will be present after Refined secures a permit (final)? Related questions are as follows:
  - If the application reflects the interim plan of adding steel plates to area #2, the capacity of this unit does not match the capacity listed in the Part A application (448 cubic yards and 4600 cubic yards, respectively). In addition, on page 4 of 7 of the Part A, 2 units are indicated under process code S06.
  - As far as the design of unit #2 is concerned, steel plates under concrete should not be considered an adequate design for a RCRA containment building unit. This unit may be adequate in the interim, but should not be considered as a final (approved) design unless Refined provides additional information. I would ensure that all parties understand that the unit does not meet permitting standards.
  - According to Mr. Steinwertzel's letter, Area #2 is a 90-day unit. If so, why is it addressed in the Part A? Or isn't it?

- Will the existing unit that will become Area #2 be closed before retrofitting with steel plates? Will Area #2 be used as a 90-day unit when the final phases are complete?

- Why is Process Code S06 listed with waste number D002 (battery acid) on page 6 of 7? Free liquid placement/management is prohibited in a containment building. Permitted tank/container storage/treatment is permissible in a permitted containment building, however.

- Does or will Refined accept off-site K069? The listing of K069 in S01 suggests it does. Has there been any discussion of which wastes in particular will be subject to regulation. According to Paula Bansch, there hasn't been any clarification of whether Refined will seek to exclude certain wastes such as first run slag from RCRA regulation. Interpretations have been made that the addition of off-site K069 throws the so-called "indigenous principle" out the window, thereby extending the derived-from rule to all wastes generated downstream. Simply put, the addition of off-site K069 could make end run or "discarded" slag a listed waste (K069). This is more of a State issue, though.

In summary, the design and construction of Area #2 is not an issue to RPB provided the order clearly spells out what it will be used for and for how long. We would not want to be in the position of reviewing the design for this unit after it had been built and put into service. The company should not expect the unit to be permitted unless the necessary design and operation information is submitted.

cc: Paula Bansch, IDEM

SWIDLER
&
BERLIN
CHARTERED

March 5, 1995

VIA COURIER

Leonard M. Gelman,
Trial Attorney, Environmental Enforcement Section
U.S. Department of Justice
Box 7611, Ben Franklin Station
Washington, D.C. 20044

Re: Refined Metals Corporation

Dear Lee:

On behalf of Refined Metals Corporation, I am writing you with respect to the meeting conducted on February 9, 1995.

Initially, I would like to apologize for the delay in preparing this correspondence. Effective February 27, I joined the law firm of Swidler & Berlin Chartered. One consequence of moving my practice(and 500 boxes) is that I have not been able to address the issues raised during the meeting. Hopefully, this letter will begin to remedy that deficiency.

As per our discussions, please find enclosed a copy of a draft Part A permit application. While EPA and IDEM are not authorized to approve the Part A permit application, the Company wanted to provide a draft in recognition of the cooperative nature of the negotiations. It is my understanding that the Part A permit application will be attached as Exhibit A to the Consent Decree. By this letter, I am requesting that IDEM and EPA forward to my attention, any comments regarding the enclosure.

In addition, during the meeting the parties addressed the land disposal restrictions ("LDRs")requirements as they relate to slag material which is not reclaimed and thus becomes a solid waste (hereinafter referred to as "discarded" slag). Since the parties are assuming that the discarded slag is a hazardous waste, we explored the application of the LDRs to the material. The parties concluded that in order for Refined Metals Corporation to satisfy 40 C.F.R. Section 264, Subpart DD, it must retrofit the existing discarded slag storage area.

3000 K Street, N.W. ■ Suite 300
Washington, D.C. 20007-5116
(202)424-7500 ■ Telex 701131 ■ Facsimile (202)424-7645

The parties determined that the facility could meet the LDRs exemption criteria provided it installs steel plates underneath the discarded slag storage area and elevates the walls surrounding that area. EPA requested that Refined Metals Corporation confirm, in writing, its commitment to upgrade the discarded slag storage area in conformance with the February 9 discussions. This letter will serve as that confirmation.

Specifically, Refined Metals Corporation will only store discarded slag in the area designated "2" in the attached diagram. Furthermore, no discarded slag will be stored for more than 90 days. This area, which is approximately 56' by 27', will be underlined with steel plates. The facility is currently investigating the thickness of the steel plates; a minimum of 3/8" will be required. A new wall will be installed to segregate this area; the approximate configuration of the wall will be 56' x 8' x 8". Further, the existing exterior wall will be elevated. Consequently, the area will be surrounded, on three sides, by 8' concrete walls.

Refined Metals Corporation requests that the regulatory agencies review this proposal and provide written approval before the Company undertakes the necessary modifications.

On behalf of Refined Metals Corporation, we appreciate your attention to this request. Under separate cover, I will provide you with the revised language in connection with the Consent Decree.

Sincerely,

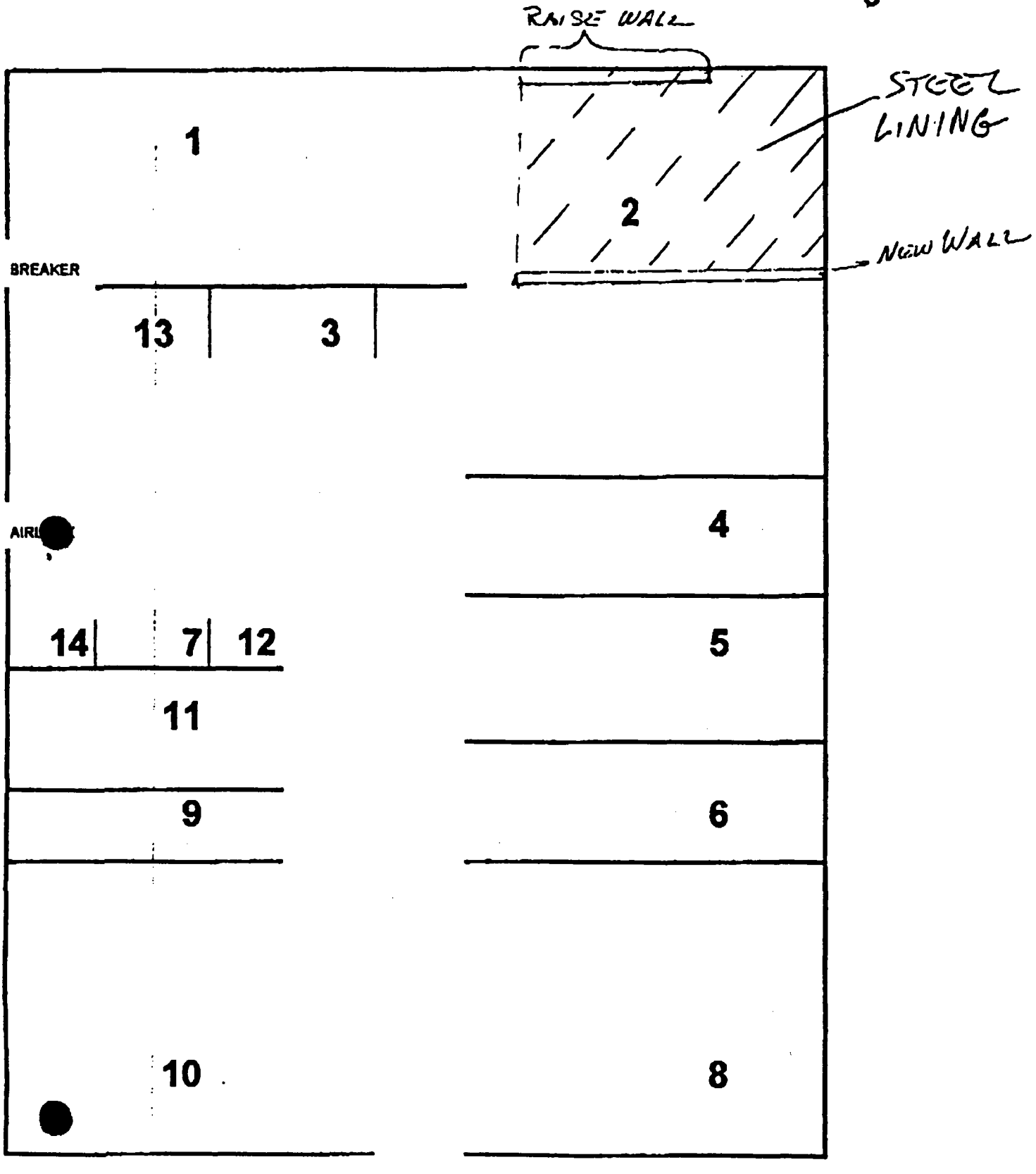
Robert N. Steinwurtzel

Enclosures

cc: Brian Barwick
Leslie Williams
Bill Freudiger
Mike Meloy
Craig Hogarth

REFINED METALS BEECH GROVE
MATERIAL STORAGE ROOM

N
W E
S



Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

For EPA Regional Use Only

Date Received
Month Day Year

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the instructions before starting)

DRAFT

I. Installation's EPA ID Number *(Mark "X" in the appropriate box)*

[ ] A. First Part A Submission [X] B. Part A Amendment #

C. Installation's EPA ID Number	D. Secondary ID Number *(If applicable)*
INDO007181300	NA

II. Name of Facility

REFINED METALS CORPORATION

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

3700 SOUTH ARLINGTON AVENUE

Street *(Continued)*

City or Town	State	Zip Code
BEECH GROVE	IN	46107

County Code *(If known)*	County Name
049	MARION

B. Land Type (Enter Code)	C. Geographic Location: LATITUDE (Degrees, Minutes & Seconds)	LONGITUDE (Degrees, Minutes & Seconds)	D. Facility Existence Date: Month Day Year
P	394205	1086035	1968

IV. Facility Mailing Address

Street or P.O. Box

PO BOX 188

City or Town	State	Zip Code
BEECH GROVE	IN	46107

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(Last)*	*(First)*
FREUDIGER	T. WILLIAM

Job Title	Phone Number *(Area Code and Number)*
VICE PRESIDENT	901-775-3772

VI. Facility Contact Address *(see instructions)*

A. Contact Address Location [ ] Mailing [ ] Other [X]

B. Street or P.O. Box

PO BOX 9009

City or Town	State	Zip Code
MEMPHIS	TN	38109

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Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
IND000718130	NA

VII. Operator Information (See instructions)

Name of Operator

REFINED METALS CORPORATION

Street or P.O. Box

3700 ARLINGTON AVENUE

City or Town	State	Zip Code
BEECH GROVE	IN	46107 —

DRAFT

Phone Number (Area Code and Number)	B. Operator Type	C. Change of Operator Indicator	Date Changed Month Day Year
317 — 787 — 6364	P	Yes [ ] No [X]	

VIII. Facility Owner (See instructions)

A. Name of Facility's Legal Owner

REFINED METALS CORPORATION

Street or P.O. Box

PO BOX 90099

City or Town	State	Zip Code
MEMPHIS	TN	38109 —

Phone Number (Area Code and Number)	B. Owner Type	C. Change of Owner Indicator	Date Changed Month Day Year
901 — 775 — 3772	P	Yes [ ] No [X]	

IX. SIC Codes (4-digit, in order of significance)

Primary		Secondary	
3341	Secondary Lead Smelting & Refining		
Secondary		**Secondary**	

X. Other Environmental Permits (See instructions)

A. Permit Type (Enter code)	B. Permit Number	C. Description
E	3341030	POTW DISCHARGE PERMIT
E	0036	AIR POLLUTION CONTROL SECTION

DRAFT

EPA I.D. Number *(Enter from page 1)*

I	N	D	0	0	0	7	1	8	1	3	0

Secondary ID Number *(Enter from page 1)*

N	A											

XI. Nature of Business *(Provide a brief description)*

SIC Code 3341 - Lead-Acid battery reclamation/secondary smelting of lead-bearing scrap and residues.

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XII. Process Codes and Design Capacities

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.*

B. PROCESS DESIGN CAPACITY - *For each code entered in column A, enter the capacity of the process.*

1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*
2. **UNIT OF MEASURE** - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-fee or Hectare-meter
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day r Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons or Liters
S05	Drip Pad	Gallons or Liters
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T04	Incinerator Other Treatment	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per hour; or BTUs Per Hour Gallons Per Day or Liters Per Day Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or BTUs Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or BTUs Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting or Refining Furnace	
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or BTUs Per Hour
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or BTUs per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	I

EPA I.D. Number *(Enter from page 1)*

I	N	D	0	0	0	7	1	8	1	3	0

Secondary I.D. Number *(Enter from page 1)*

N	A										

XII. Process Codes and Design Capabilities *(Continued)*

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit of Measure (Enter Code)	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	1,207.592	G	003	
	2	S	0	6	4.600	Y	002	
	3	S	0	4	600.000	G	001	
	4	S	0	3	15.000	Y	009	
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

***NOTE:** If you need to list more than 13 process codes, attach an additinoal sheet(s) with the infomration in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04, and X99) in Item XIII.*

XIII. Other Processes *(Follow instructions from Item XII for D99, S99, T04 and X99 process codes)*

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit of Measure (Enter Code)	C. Process Total Number of Units	D. Description of Processes
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

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Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*												Secondary ID Number *(Enter from page 1)*											
I	N	D	0	0	0	7	1	8	1	3	0	N	A										

X. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

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1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "OOO" in the extreme right box of Item XIV-D(1).*
3. *Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and /or dispose of the waste.*
2. *In column A of the next line, enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 3 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter code)									D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included with above

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EPA I.D. Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
I	N	D	0	0	0	7	1	8	1	3	0	N	A										

XIV. Description of Hazardous Wastes (Continued)

Line Number		A. EPA HAZARDOUS WASTE NO. (Enter Code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES								
								(1) PROCESS CODES (Enter code)								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
	1	D	0	0	8	50,000	T	S	0	1	S	0	6	S	0	3	S04
	2	D	0	0	2	1,700,000	G	S	0	1	S	0	6	S	0	3	
	3	K	0	6	9	5,000	T	S	0	1	S	0	6	S	0	3	
	4																
	5																
	6																
	7																
	8																
	9																
1	0																
1	1																
1	2																
1	3																
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2	9																
3	0																
3	1																
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3	3																

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EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
I N D 0 0 0 7 1 8 1 3 0	N A

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

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XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	Date Signed
Name and Official Title (Type or print)	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

[1] S03 Units are designated as separate units for administrative purposes in the Part A Hazardous Waste Permit Application.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

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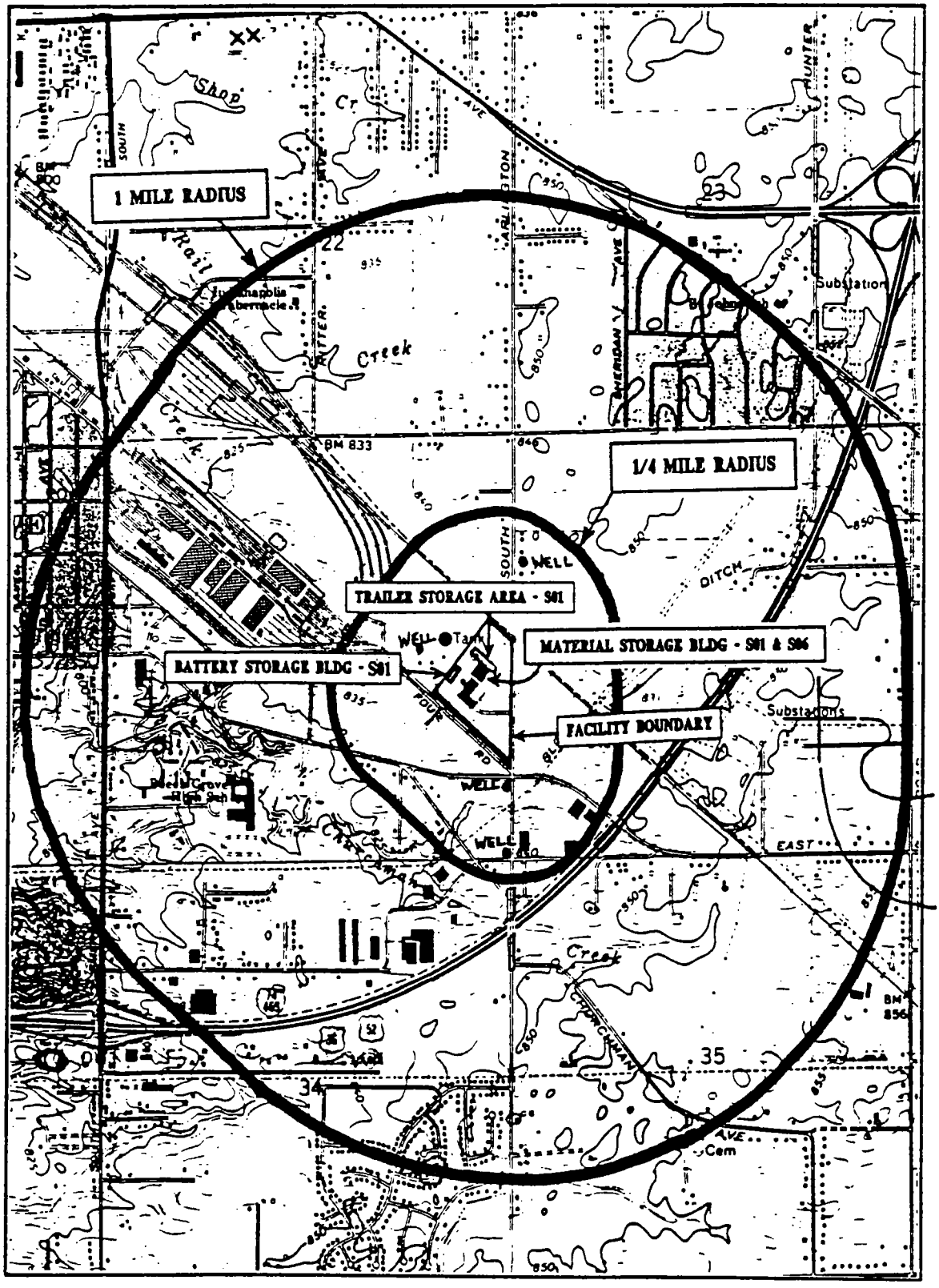

NORTH

INDIANA

QUADRANGLE LOCATION

39° 43' N

86° 03' W

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NOTES:

1. NO INJECTION WELLS ARE LOCATED AT THE FACILITY.

REF: USGS 7.5 MINUTE SERIES
INDIANA – BEECH GROVE QUADRANGLE

SCALE: 1" = 2000'

0 1000 2000

REFINED METALS CORPORATION
BEECH GROVE, INDIANA

TOPOGRAPHIC MAP
1 MILE RADIUS OF FACILITY

DRAWN BY: JFH		DATE:	8-25-94
APP BY: AF	HERITAGE	SCALE:	1" = 2000'
JOB NO. 28190		DWG.	28190W03

HERITAGE ENVIRONMENTAL SERVICES, INC.
INDIANAPOLIS, INDIANA

SCALE DRAWINGS
EXISTING REGULATED UNITS
AND UNITS BEING PERMITTED

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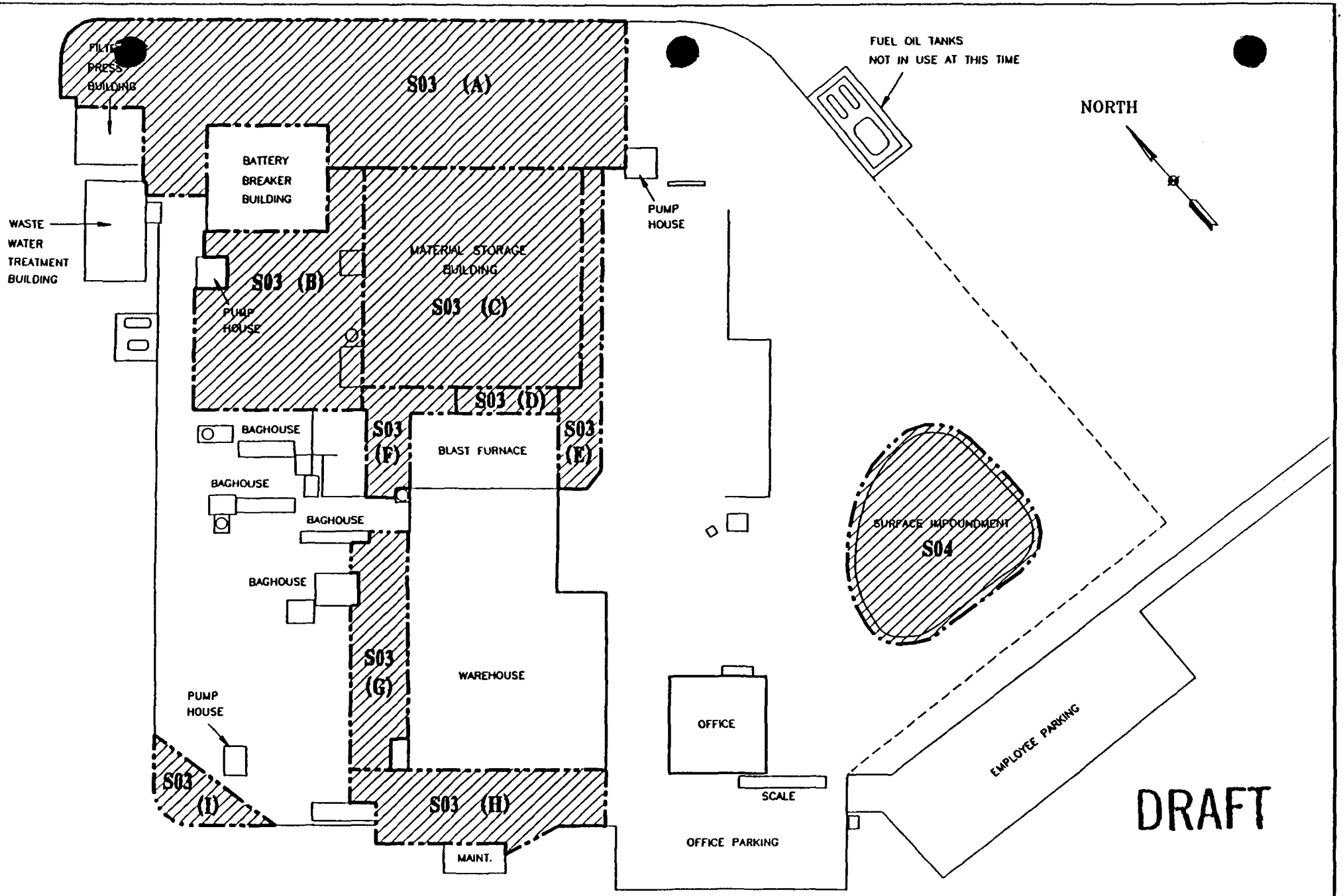


HERITAGE

EXTRACED FROM:

EXHIBIT B

SCALE: 1" = 100'

0 1/2" 1"

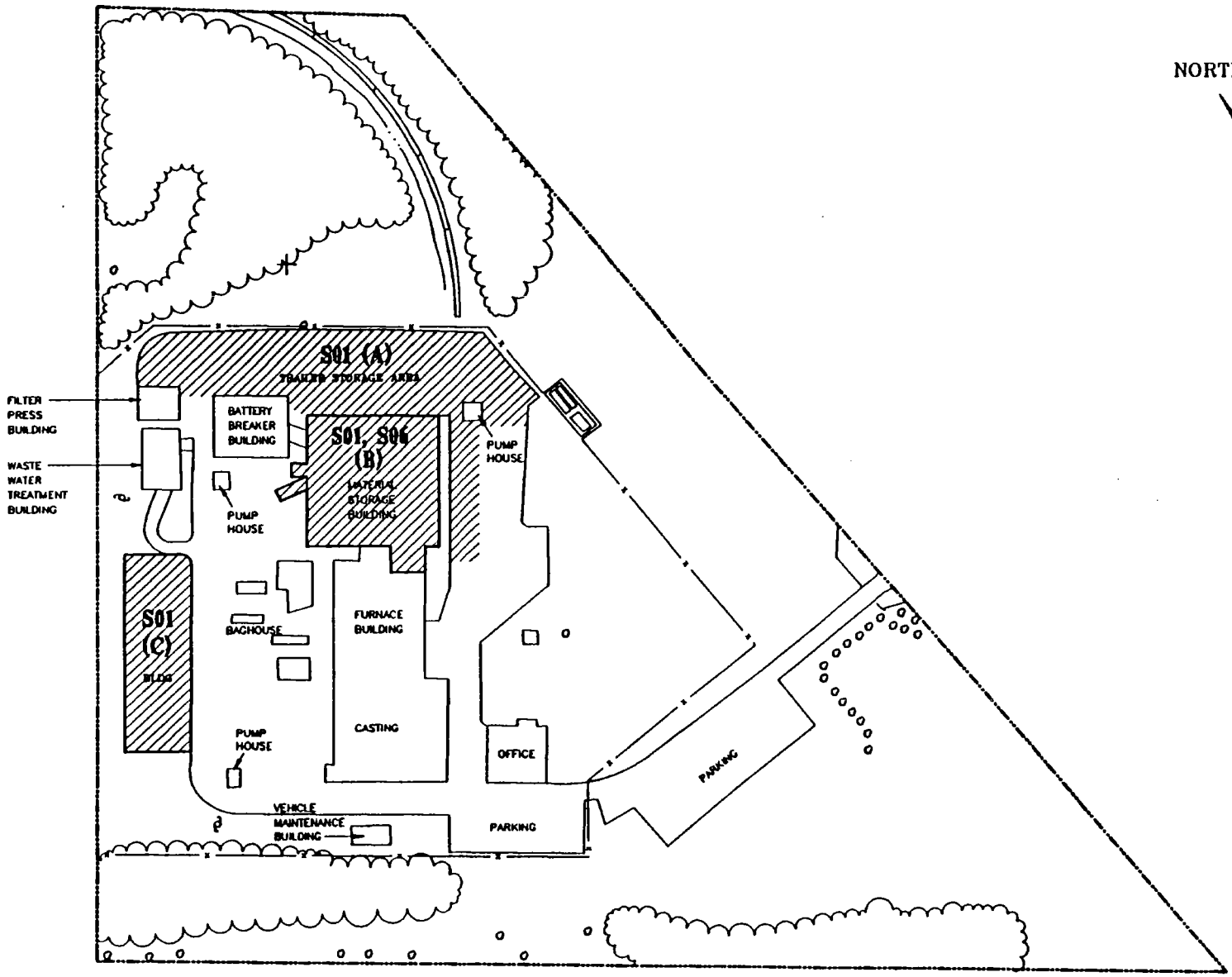
0 50' 100'

DRAWN BY: JFH	DATE: 2-14-95	PROJ. NO. 28190
APP. BY: RB	SCALE: 1" = 100'	DWG. NO. 28190X67

HERITAGE ENVIRONMENTAL SERVICES, INC.
INDIANAPOLIS, INDIANA

REFINED METALS CORPORATION
BEECH GROVE, INDIANA

EXISTING SITE PLAN



HERITAGE

SCALE: 1" = 200'

0 1/2" 1"

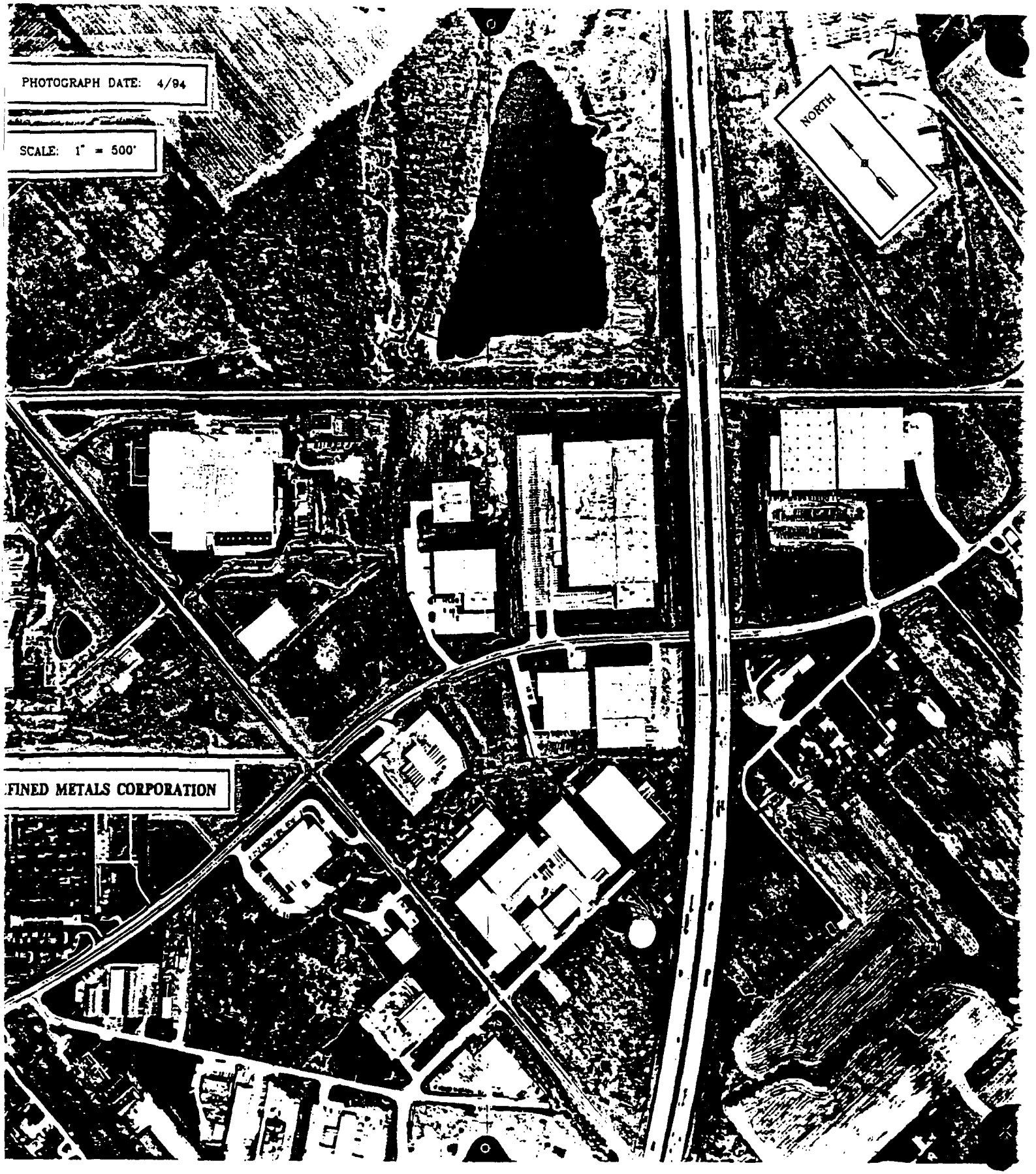
0 100' 200'

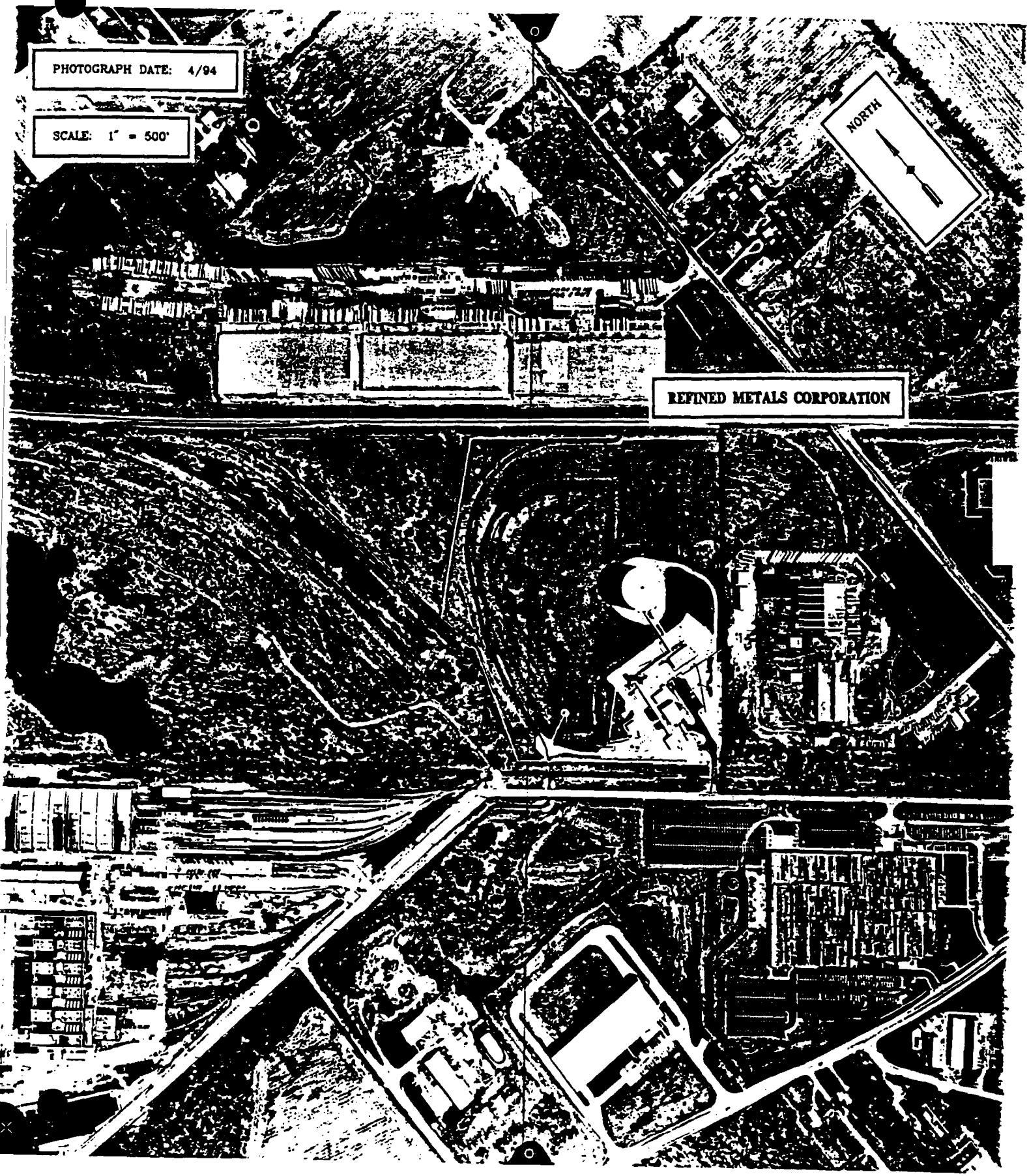
DRAWN BY: JFH	DATE: 2-14-95	PROJ. NO. 28190
APP. BY: RB	SCALE: 1" = 200'	DWG. NO. 28190X68

HERITAGE ENVIRONMENTAL SERVICES, INC.
INDIANAPOLIS, INDIANA

REFINED METALS CORPORATION
BEECH GROVE, INDIANA

FUTURE SITE PLAN


PHOTOGRAPH DATE: 4/94
SCALE: 1" = 500'
NORTH
FINED METALS CORPORATION


PHOTOGRAPH DATE: 4/94
SCALE: 1" = 500'
NORTH
REFINED METALS CORPORATION

LEGAL DESCRIPTION

Part of the Northeast Quarter and part of the Southeast Quarter of Section 27, Township 15 North Range 4 East, Marion County, Indiana, being more particularly described as follows:

Commencing at the Southeast corner of said Northeast Quarter; thence North 0° 04'06" West, on and along the East line of said Northeast Quarter, 27.83 feet measured (27.6 feet deed) to the Southwesterly line of the original 80 foot right of way line of the C. C. C. St. L. R. R.; thence North 49° 57'00" West on and along said right of way line, 19.61 feet measured (19.60 feet deed) to the point of beginning of this description; thence South 0° 04'08" East, parallel to and 15.00 feet from said East line, 40.45 feet, thence South 0° 00'00" West, parallel to and 15.00 feet from the East line of said Southeast Quarter, 1527.23 feet to the Northeasterly line of Big Four Road; thence North 49° 57'00" West, on and along said Northeasterly line, 1150.00 feet thence North 40° 08'00" East 80.00 feet, thence North 49° 57'00" West, parallel to said Northeasterly line, 280.24 feet; thence North 40° 02'50" East measured (North 40° 03' East deed) 1120.00 feet to said Southwesterly rail road right of way line; thence South 49° 57'00" East, on and along said right of way line, 421.53 feet to the point of beginning.

DRAFT

FILE

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

June 3, 1991

Mr. T. Wilham Freudiger, Vice President
Refined Metals Corporation
P.O. Box 9009
Memphis, Tennessee 38109

Re: Request for Revision of the
Part A Application
Refined Metals Corporation
Indianapolis, Indiana
IND 000718130

Dear Mr. Freudiger:

The Indiana Department of Environmental Management (IDEM) has received the revised Part A application signed on December 7, 1990. The application was submitted on behalf of Refined Metals by Mr. Jeffery S. Hannapel to resolve the pending administrative action (Cause No. 89-S-J-254).

The revised Part A application amends the storage capacity for spent batteries (S03) from 200 cubic yards to 400 cubic yards. No additional waste codes were added. The IDEM has reviewed the Part A application and the justification previously submitted (September 18, 1990). Upon review of the documents, the December 7, 1990 Part A application is hereby deemed to be in compliance with 329 IAC 3-38-3(b) and thereby approved.

Please be advised that in approving this Part A application revision IDEM does not grant any rights under interim status that are not otherwise available to Refined Metals Corporation.

If you have any questions concerning this matter, please contact Mr. Phil Perry at 317/232-3397.

Sincerely,

W. Martin Harmless II
Assistant Commissioner
Solid and Hazardous Waste Management

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayloa Wright, U.S. EPA, Region V
Mr. Stan Rorick, IDEM

ANDREWS & KURTH
ATTORNEYS
1701 PENNSYLVANIA AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20006

OTHER OFFICES:
HOUSTON
DALLAS
LOS ANGELES

TELEPHONE (202) 662-2700
TELECOPIER (202) 662-2739
TELEX: 79-1208

December 14, 1990

Mr. H. Martin Harmless, II
Assistant Commissioner
Office of Solid and Hazardous Waste
Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206

Re: Refined Metals Corporation
IND 000718130

Dear Mr. Harmless:

Enclosed please find a revised Part A permit application for the Refined Metals Corporation's facility located in Beech Grove, Indiana. The revised Part A permit application amends the design capacity for the battery storage area that is operated under interim status at the facility. The amended design capacity has been the subject of an administrative action (Cause No. 89-S-J-254) in which Refined Metals provided information to the staff of the Department of Environmental Management to support the amended Part A permit application. The staff reviewing the information approved it as sufficient justification to support the revised storage design capacity.

In order to resolve the pending administrative action, state officials requested Refined Metals to submit its Part A permit application to your office for formal approval. Upon formal approval of the revised Part A permit application, the parties will move for dismissal of the pending action.

If you have any questions or would like additional information regarding this matter, please contact us. Thank you for your consideration and efforts regarding this issue.

Sincerely,

Robert N. Steinwurtzel
Jeffery S. Hannapel
Counsel to Refined Metals Corporation

JSH/rah

Enclosure

cc: David Freudiger, Esq.
Mr. Phil Perry ✓
Stanley H. Rorick, Esq.

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F IND000718130

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, aff it in the designated space. Review the inform stion carefully; if any of it is incorrect, cro through it and enter the correct data in t appropriate fill—in area below. Also, if any the preprinted data is absent *(the area to t left of the label space lists the informatio that should appear)*, please provide it in t proper fill—in area(s) below. If the label complete and correct, you need not comple items I, III, V, and VI *(except VI-B whic must be completed regardless)*. Complete items if no label has been provided. Refer the instructions for detailed item descri tions and for the legal authorizations und which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP REFINED METALS CORP

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 RON WIDENER PLANT MGR	317 787 6366

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	
3 PO BOX 188	

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 BEECH GROVE	IN	46107

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5 3700 SOUTH ARLINGTON AVE	

B. COUNTY NAME			
MARION			
C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 BEECH GROVE	IN	46107	

CONTINUE ON REVER

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3341 Secondary Lead Smelting	NA
C. THIRD	**D. FOURTH**
NA	NA

VIII. OPERATOR INFORMATION

A. NAME: REFINED METALS CORP

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, M = PUBLIC (other than federal or state), S = STATE, O = OTHER (specify), P = PRIVATE: P

D. PHONE (area code & no.): A 317 787 6364

E. STREET OR P.O. BOX: PO BOX 188

F. CITY OR TOWN: BEECH GROVE

G. STATE: IN

H. ZIP CODE: 46107

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N	D. PSD (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U	E. OTHER (specify): 9 STATE AQ PERMITS (specify) (See Attachment 1)
C. RCRA (Hazardous Wastes): 9 R	E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. (See Attachment 2)

XII. NATURE OF BUSINESS (provide a brief description)

Secondary Lead Smelting. The plant processes scrap metal and lead bearing raw materials into refined lead alloys.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
T. William Freudiger Vice President		12-1-80

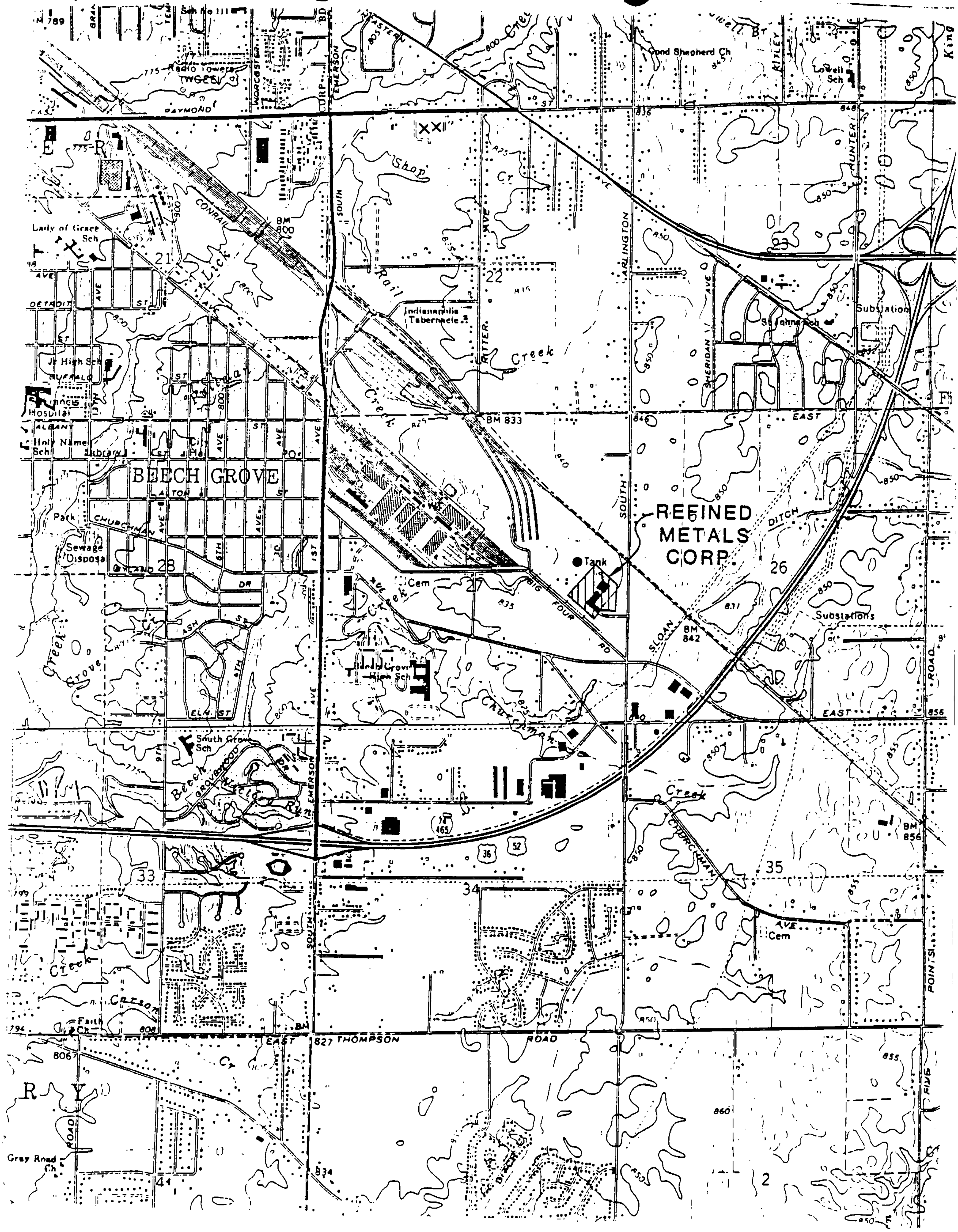
COMMENTS FOR OFFICIAL USE ONLY

C

ATTACHMENT 1

STATE AIR QUALITY PERMITS

Permit No.	Date Issued	Description
08025	12-29-83	Blast Furnace (Cupola) with Baghouse Cyclone and Afterburner
08027	12-29-83	Sanitary Ventilation for Blast Furnace Slag Tap, Slag Cooling Area, Lead Well and Launder with Cyclone and Baghouse Dust Collectors
08028	12-29-83	Refinery Kettle No. 1
08029	12-29-83	Refinery Kettle No. 2
08030	12-29-83	Refinery Kettle No. 3
08031	12-29-83	Refinery Kettle No. 4
08032	12-29-83	Refinery Kettle No. 5
08033	12-29-83	Refinery Kettle No. 6
08034	12-29-83	Refinery Kettle No. 7



REFINED
METALS
CORP.
Tank
BEECH GROVE
Cond Shepherd Ch
Lowell Sch
Radio Towers (WGEE)
RAYMOND
CONRAIL
Lady of Grace Sch
Jr High Sch
Hospital
Holy Name Sch
Library
Park
Sewage Disposal
CHURCHMAN AVE
Indianapolis Tabernacle
St Johns Sch
Substation
Substations
Shop Cr
Rail Creek
Creek
Lick Creek
Cem
Beech Grove High Sch
South Grove Sch
Beech Grove Run
Faith Ch
Gray Road Ch
ARLINGTON
SOUTH EMERSON AVE
SHERIDAN AVE
RITTER AVE
HUNTER
BIG FOUR RD
SLOAN
EAST
DITCH
THOMPSON ROAD
EAST
POINT SI
CHURCHMAN AVE
Carson Cr
BM 800
BM 833
BM 842
BM 856
21
22
23
26
27
28
33
34
35
2
465
36
52

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I N D 0 0 0 7 1 8 1 3 0 (T/A) 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)* (for Battery Storage Area)

✓ [X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C 8 — YR. — MO. — DAY

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. — MO. — DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP (T/A) 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S03	(Battery Storage Area) 400	Y		7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

E. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

NA

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K054	900	P	T03 D80	
X-2	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	T/A	C	FOR OFFICIAL USE ONLY		T/A	C	
W I N D 0 0 0 7 1 8 1 3 0		1	W	DUP		2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 0 2	1600*	T	S 0 3	(Battery Storage Area)
2	D 0 0 8				
3					
4					
5					
6					
7					
8		* Quantity shown represents the maximum quantity in storage at any one time.			
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

NA

EPA I.D. NO. *(enter from page 1)*

1	2	3	4	5	6	7	8	9	10	11	12	T/A 13	C 14	15
F	I	N	D	0	0	0	7	1	8	1	3	0		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* (See attachment 3)

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of ure storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
65 66 67 68 69 - 71	72 - 74 75 76 77 - 79

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
C E REfined Metals Corp., Lee Swain, President	9 0 1 - 7 7 5 - 3 7 7 0

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F P. O. Box 9006	C G Memphis	T N	3 8 1 0 9

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
T. William Freudiger Vice President	T. William Freudiger	12-7-90

X. OPERATOR CERTIFICATION

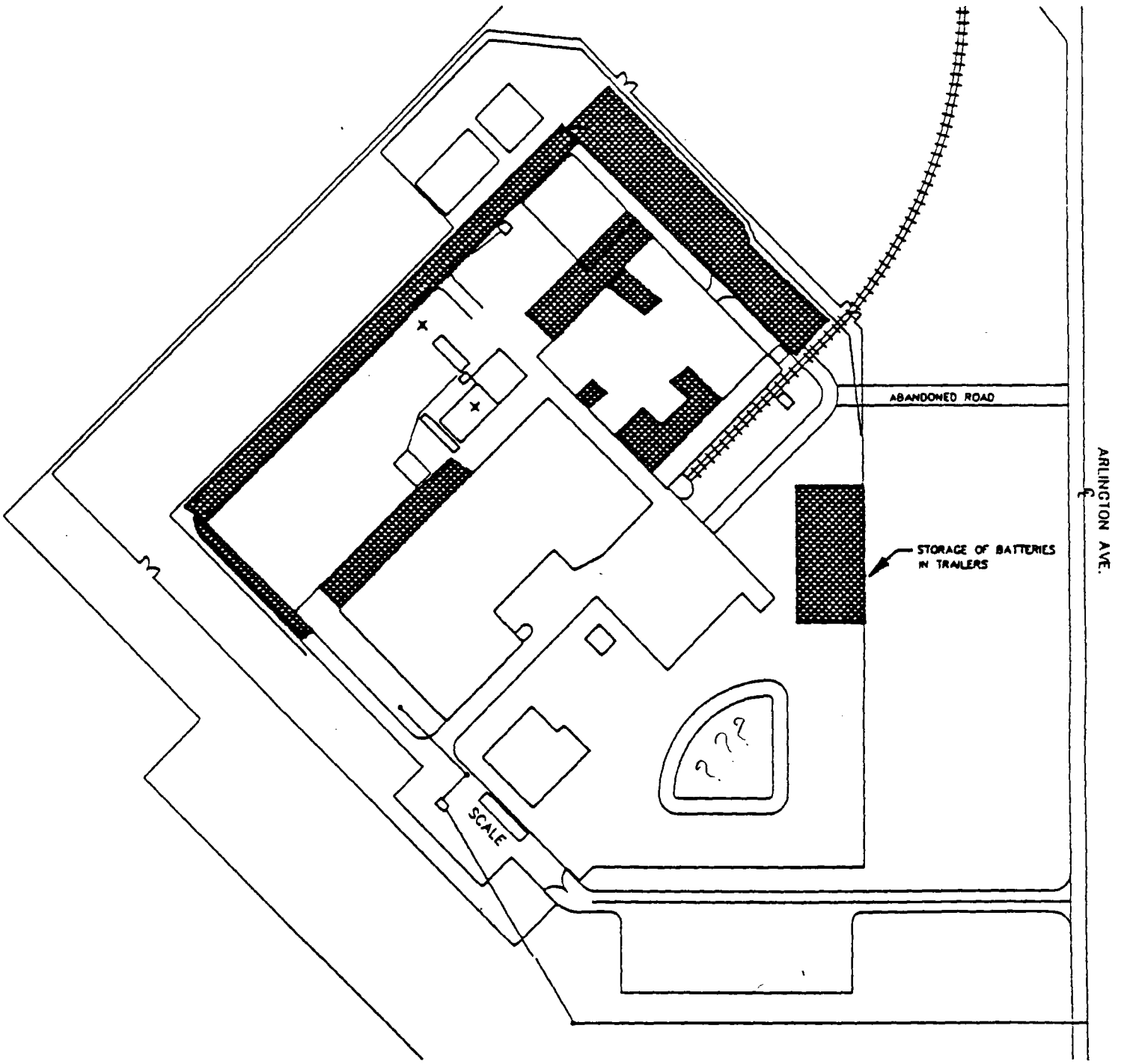
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
NA	NA	NA

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

(See Attachment 3)



LEGEND

CONTAINER STORAGE AREA

N
W
E
S

100 50 0 100 200

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P730-167-587

September 20, 1989

Mr. T. William Freudiger, Vice President
Refined Metals Corporation
P.O. Box 9009
Memphis, Tennessee 38109

Re: Interim Status Expansion Request
Refined Metals Corporation
Beech Grove, Indiana
IND 000718130

Dear Mr. Freudiger:

On May 8, 1989, the Indiana Department of Environmental Management (IDEM) received your letter concerning Refined Metal's justification for increasing the battery storage capacity from two hundred (200) cubic yards to four hundred (400) cubic yards.

In previous letters submitted by Refined Metals dated November 1, 1988, and January 23, 1989, no justification or demonstration of the lack of other hazardous waste management facilities was made. On the May 8, 1989, a justification was provided, however, there has been no demonstration of a lack of available treatment, storage, recovery or disposal capacity at other hazardous waste management facilities as requested pursuant to 329 IAC 3-38-3(b).

Since Refined Metals has failed to demonstrate the lack of available treatment, storage, recovery or disposal capacity at other hazardous waste management facilities, IDEM denies Refined Metals request to increase interim status battery storage capacity. The battery storage capacity shall remain at two hundred (200) cubic yards.

If you wish to challenge this decision, IC 13-7-10-2.5 and IC 4-21.5-3-7 require that you file a Petition for Administrative Review. If you seek to have the effectiveness of the decision stayed during the administrative review, you must also file a Petition for Stay. The petition(s) must be submitted to the Commissioner at the above address within fifteen (15) days after your receipt of this notice. The petition(s) must include facts demonstrating that you are either the applicant, a person aggrieved or other wise adversely affected by the decision, or other wise entitled to review by law. Additionally, IC 13-7-10-2.5 requires that a Petition for Administrative Review must include:

1. The name and address of the person making the request.

2. The interest of the person making the request.

3. Identification of any persons represented by the person making the request.

4. The reasons, with particularity, for the request.

5. The issues, with particularity, proposed for consideration at the hearing.

6. Identification of the terms of the decision which, in the judgement of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing licenses of the type granted or denied by the Commissioner.

Pursuant to IC 14-21.5-3-1(f), any document serving as a petition for review or review and stay must be filed with Kathy Prosser, Technical Secretary of the Solid Waste Management Board. Filing of such a document is complete on the earliest of the following dates:

1. the date on which the petition is delivered to the Office of the Technical Secretary of the Solid Waste Management Board, located at 105 South Meridian Street, Fifth Floor, Indianapolis, Indiana 46225;

2. the date of the postmark on the envelope containing the petition, if the petition is mailed by United States mail; or

3. the date on which the petition is deposited with a private carrier, as shown by a receipt issued by the carrier, if the petition is sent by private carrier.

If you have any questions regarding this matter, please contact Mr. Phil Perry at AC 317/232-3220.

Sincerely,

Bruce H Palin

Bruce H. Palin
Acting Assistant Commissioner for
Solid and Hazardous Waste Management

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Mr. David Berrey, IDEM
Mr. Dennis Zawodni, IDEM

Mary V.
FYI

FILE

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P652-575-165

April 7, 1989

Mr. T. William Freudiger, Vice President
Refined Metals Corporation
P.O. Box 9009
Memphis, Tennessee 38109

Re: Interim Status Expansion Request
Refined Metals Corporation
Beech Grove, Indiana
IND 000718130

no change is approved

Dear Mr. Freudiger:

On January 23, 1989, our office received your letter requesting that Refined Metal's Part A permit application be updated to increase your battery storage capacity from two hundred (200) cubic yards to four hundred (400) cubic yards.

In our original correspondence dated January 5, 1989, it was recommended that the capacity increase request be addressed through a modification to your Part B permit application. This was intended only as a recommendation and not as a denial of your request. Indiana Hazardous Waste Rule 329 IAC 3-38-3(b) states "increases in the design capacity of processes used at a facility may be made if the owner or operator submits a revised Part A permit application." Section 3(b) also includes the requirement for justification explaining the need for change and describing the lack of available treatment, storage, recovery or disposal capacity at other hazardous waste management facilities.

In both letters received from Refined Metals, no justification or demonstration of the lack of other hazardous waste management facilities was made. Since your request for increased storage capacity indicated that no changes or reconstruction to the facility will be required, no further discussion on this particular matter will be required pursuant to 329 IAC 3-38-3(e). In order to address the above issues, please submit substantial documentation to this office within fifteen (15) days from receipt of this letter. Failure to submit necessary documentation will result in the denial of your request.

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If you have any questions regarding this matter, please contact Mr. Phil Perry at AC 317/232-3220.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

PP/jlw
cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fay Wright, U.S. EPA, Region V

Gus Blom
please file
thanks!

FILE COPY

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

January 5, 1989

Mr. T. William Freudiger, Vice President
Refined Metals Corporation
P.O. Box 9009
Memphis, Tennessee 38109

Re: Interim Status Expansion Request
Refined Metals Corporation
Beech Grove, Indiana
IND 000718130

Dear Mr. Freudiger:

On November 1, 1988, our office received your request for an interim status expansion of your battery storage area from two-hundred (200) cubic yards to four-hundred (400) cubic yards, with attached modified Part A Application dated October 26, 1988. Unless it can be demonstrated that there is a lack of available treatment, storage, recovery, or disposal capacity at other state hazardous waste management facilities (329 IAC 3-38-3(b)), it is recommended that this expansion request be addressed through a modification of your Part B Application, rather than as a Part A change during interim status.

Also in no event shall changes be made to a hazardous waste management facility during interim status which amount to reconstruction of the facility. Reconstruction occurs when the capital investment in the changes to the facility exceeds fifty (50) percent of the capital cost of a comparable entirely new hazardous waste management facility 329 IAC 3-38-3(e).

Should you wish to address the above issues with regard to your expansion request, please submit substantial documentation to this office within twenty (20) days of the date of receipt of this letter. Failure to submit necessary documentation will result in the denial of your request.

If you have any questions regarding this matter, please contact Ms. Jill Stevens at AC 317/232-3243.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JS/td

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Bernie Orenstein, U.S. EPA, Region V